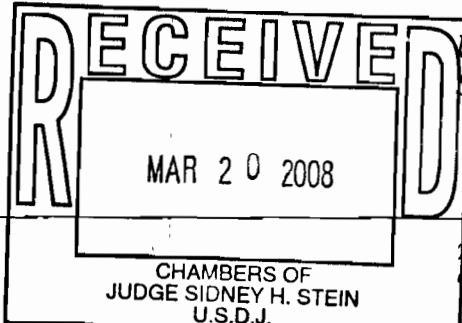




U.S. Department of Justice



United States Attorney
Southern District of New York

DOC #

DATE FILED: 3/21/08 (hs)

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 20, 2008

BY FACSIMILE

The Honorable Sidney H. Stein
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. Lucero Gomez & Juan Carlos Naut,
08 Cr. 32 (SHS)

Dear Judge Stein:

The Government writes (with the consent of defense counsel) to respectfully request an extension of time in which it may produce discovery, and a 30-day adjournment of the conference scheduled for March 21, 2008 in the above-referenced case. The discovery in the case is more extensive than originally anticipated, and the Government has needed additional time to make its production. The Government will provide the initial discovery this week, but will need an additional two weeks to provide the discovery materials relating to Title III wiretaps conducted in Massachusetts. Because of the Government's delay, defense counsel is presently unable to inform the Court of their intentions with respect to any motions they may wish to make, and therefore they join in this request for an adjournment of the conference date.

Should the Court grant the adjournment request, the Government further respectfully requests that the Court exclude the time under the Speedy Trial Act until the new conference date. In the interim, the Government will provide defense counsel with copies of the

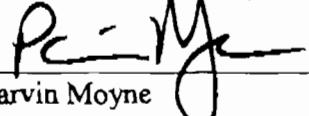
*Conf adjd to April 5 at 2 p.m. Time excluded
from 3/21/08 until 4/25/08 pursuant to 18 U.S.C. 3161(h)(8)(a). The ends
justify the means of the trial.
public and the def's in a speedy trial.
The purpose of the exclusion is to allow
discovery to continue.*

SO ORDERED 3/20/08

SIDNEY H. STEIN
U.S.D.J.

discovery, defense counsel will review the discovery with their respective clients, and the parties will continue discussions regarding a possible disposition of this case.

Respectfully submitted,
MICHAEL J. GARCIA
United States Attorney


By: Parvin Moyne
Assistant United States Attorney
Telephone: (212) 637-2510

cc: Mitchell Dinnerstein, Esq. (by facsimile)
Martin L. Schmukler, Esq. (by facsimile)